

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 7
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET. AL.	§	CASE NO. 21-51523
	§	JOINTLY ADMINISTERED
DEBTORS	§	

**NOTICE OF WITHDRAWAL OF BEXAR COUNTY’S RESPONSE TO THE MOTION OF
CHAPTER 7 TRUSTEE FOR AUTHORIZATION TO SELL PROPERTY OF THE ESTATE
BY PUBLIC AUCTION AND TO AUTHORIZE PAYMENT TO
AUCTIONEER FROM SALES PROCEEDS**

NOW COMES Bexar County and files this Notice of Withdrawal of its Response to the Motion of Chapter 7 Trustee for Authorization to Sell Property of the Estate by Public Auction and to Authorize Payment to Auctioneer from Sales Proceeds (“Response”). In support thereof, Bexar County respectfully represents the following:

1. Bexar County filed its Response herein on February 2, 2022 (ECF #60).
2. The issues pertinent to Bexar County’s Response have been resolved by an agreement with the Trustee.
3. Bexar County desires to withdraw its Response filed herein based upon the reasons stated above.

Respectfully submitted,

**LINEBARGER GOGGAN
BLAIR & SAMPSON, LLP**
112 E. Pecan Street, Suite 2200
San Antonio, TX 78205
(210) 225-6763 - *Telephone*
(210) 225-6410 - *Fax*

By: /s/ Don Stecker
David G. Aelvoet (SBN 00786959)
Don Stecker (SBN 19095300)
Bradley S. Balderrama (SBN 24040464)
Attorney for Bexar County

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Withdrawal of its Response to the Motion of Chapter 7 Trustee for Authorization to Sell Property of the Estate by Public Auction and to Authorize Payment to Auctioneer from Sales Proceeds was served this 9th day of February, 2022 by Electronic Filing and/or by First Class Mail upon the following:

Debtor:

deeproot Capital Management, LLC
12621 Silicon Dr
San Antonio, TX 78249

Debtor:

Policy Services, Inc.
12621 Silicon Dr
San Antonio, TX 78249

Counsel for Debtors:

Catherine A. Curtis
Wick Phillips Gould & Martin, LLP
3131 McKinney Ave, Suite 500
Dallas, TX 75204

Jason M. Rudd
Wick Phillips Gould & Martin LLP
3131 McKinney Ave, Suite 500
Dallas, TX 75204

Chapter 7 Trustee:

Mr. John P. Lowe
2402 East Main Street
Uvalde, TX 78801

Counsel for Chapter 7 Trustee:

Randall A. Pulman
Pulman Cappuccio & Pullen LLP
2161 NW Military Hwy, Suite 400
San Antonio, TX 78213

/s/ Don Stecker
David G. Aelvoet
Don Stecker
Bradley S. Balderrama